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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

-----X

NOTICE OF FILING OF SECOND SUPPLEMENT TO SCHEDULE "1" TO THE MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION (MONETARY RELIEF <u>ACTIONS</u>, OTHER THAN IGNITION SWITCH ACTIONS)

PLEASE TAKE NOTICE that on October 6, 2014, General Motors LLC filed the attached Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other Than Ignition Switch Actions) with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York October 6, 2014

Respectfully submitted,

/s/ Scott I. Davidson
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SECOND SUPPLEMENT¹ TO SCHEDULE "1"

CHART OF MONETARY RELIEF ACTIONS COMMENCED AGAINST NEW GM NOT CONTAINED IN THE PREVIOUS SUPPLEMENT TO SCHEDULE "1" TO MOTION TO ENFORCE

	<u>Name</u>	Class Models	Plaintiffs' Model	<u>Court</u>	Filing Date
1	Belt ²	N/A	2007 Chevy HHR	Circuit Court of McDowell County, West Virginia 14-C-97 ³	9/4/14
2	Bledsoe (Class Action) ⁴	Not specifically identified.	2008 Chevy Cobalt 2006 Chevy Trailblazer 2006 Chevy Cobalt 2005 Chevy Cobalt 2006 Pontiac G6 2000 Chevy Impala 2006 Chevy Impala 2007 Chevy HHR 2007 Chevy Impala	Southern District of New York 14-cv-7631	9/19/14

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This schedule supplements the original Schedule "1" previously filed with the Court in connection with the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other Than Ignition Switch Actions) on August 1, 2014 [Dkt. No. 12808-1].

A copy of the complaint filed in the Belt Action is attached hereto as Exhibit "A." In addition to allegations regarding problems with "the sunroof leaking, vehicle paint failure . . . and power steering failure . . ." in the subject vehicle (Belt Compl., ¶ 10), the complaint in the Belt Action also references alleged problems with a defective ignition switch. Accordingly, New GM is also filing simultaneously herewith supplemental schedules in connection with its Ignition Switch Motion to Enforce to address those allegations.

The Belt Action was removed by New GM to the United States District Court for the Southern District of West Virginia (No. 1:14-cv-26520) on October 3, 2014.

A copy of the complaint filed in the Bledsoe Action is attached hereto as Exhibit "B." In addition to allegations concerning vehicles with alleged defects other than defective ignition switches, the Bledsoe Complaint also contains allegations concerning (i) vehicles with allegedly defective ignition switches, and (ii) personal injuries allegedly arising from pre-363 Sale accidents. Accordingly, New GM is also filing simultaneously herewith supplemental schedules in connection with its Ignition Switch Motion to Enforce and Pre-Closing Accident Motion to Enforce to address those allegations.

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3	Watson ⁵	N/A	2009 Chevy Corvette	Western District of Louisiana	9/30/14
				6:14-cv-02832	

A copy of the complaint filed in the Watson Action is attached hereto as Exhibit "C."